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FILED

SEP - 1 2022

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

6 *Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities
7 Commission and the California Office of Energy Infrastructure Safety*

10
11 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

13 In re:

14 PG&E CORPORATION,

16 -and-

17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

19 Debtors.

20 Affects PG&E Corporation
21 Affects Pacific Gas and Electric Company
22 Affects both Debtors

23 * *All papers shall be filed in the lead case,
24 No. 19-30088 (DM)*

25 Bankr. Case No. 19-30088 (DM)
26 Chapter 11
27 (Lead Case)
(Jointly Administrated)

**DECLARATION OF WILLIAM B.
ABRAMS IN SUPPORT OF MOTION
OF WILLIAM B. ABRAMS FOR
RECONSIDERATION AND
RELATED RELIEF FROM THE
ORDER GRANTING MOTION OF
THE FIRE VICTIM TRUSTEE TO
FILE REDACTED VERSIONS OF
CERTAIN RETENTION
AGREEMENTS UNTIL LITIGATION
RELATED TO SUCH RETENTION
AGREEMENTS IS FINALLY
RESOLVED AND PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 59(e)**

1 I, William B. Abrams, pursuant to section 1746 of title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:

4 1. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a
5 Pro Se party to promote and collaborate with core parties in good-faith towards a plan, PG&E Fire
6 Victim Trust Agreement and to ensure prudent Trust oversight that provides just settlements for all
7 claimants as well as adequate restructuring for Pacific Gas and Electric Corporation so our
8 communities are safe from the growing risks of utility-caused wildfires.

9 2. I submit this declaration in support of this "MOTION OF WILLIAM B. ABRAMS
10 FOR RECONSIDERATION AND RELATED RELIEF FROM THE ORDER GRANTING
11 MOTION OF THE FIRE VICTIM TRUSTEE TO FILE REDACTED VERSIONS OF CERTAIN
12 RETENTION AGREEMENTS UNTIL LITIGATION RELATED TO SUCH RETENTION
13 AGREEMENTS IS FINALLY RESOLVED AND PURSUANT TO FEDERAL RULE OF CIVIL
14 PROCEDURE 59(e)" (the "Motion") filed concurrently herewith.

15 3. After the PG&E Fires of 2017, I felt compelled to engage as a party to certain
16 proceedings at the California Public Utilities Commission to work collaboratively towards solutions
17 that address wildfire mitigation and other utility/energy issues. Some of these proceedings are related
18 to this case. All of my filed comments are in the public record through the Commission's website.
19 As an intervenor in these proceedings, I have received some compensation from Investor Owned
20 Utilities including Pacific Gas and Electric Company. I have no financial interests in this case that
21 are adverse to those of victims. I have no litigation financing or lines of credit tied to PG&E
22 shareholders, bondholders or any other party in this case. I have not and do not intend to get any
23 compensation for my involvement in this case other than through my claim and those claims of my
24 family through the PG&E Fire Victim Trust. I have not engaged in activities to undermine the value
25 of the Fire Victim Trust or to slow the Trust administration process.

26 4. The "Exhibit A" attached to the Motion is a true and correct copy of the email
27 correspondence between myself and Trustee Counsel. I felt compelled to file this email exchange
28 given the characterization of these communications by the Trustee within the "*Motion of the Fire
Victim Trustee to File Redacted Versions of Certain Retention Agreements Until Litigation Related to
Such Retention Agreements is Finally Resolved*" (the "Trustee Motion") [Dkt. 12871].

29 5. I declare under penalty of perjury that, to the best of my knowledge and after
30 reasonable inquiry, the foregoing is true and correct and that this declaration was executed at Santa
31 Rosa, California on September 1, 2022.



29
30 William B. Abrams
31 Pro Se Claimant